

# **EXHIBIT 31**



April 14, 2014

Honorable Paul G. Gardephe  
United States District Court for the Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Dear Judge Gardephe:

I am writing this letter on behalf of Mathew Martoma who I understand will be sentenced by you. I am aware that Mathew was found guilty of insider trading and am aware of the seriousness of the crime. I would like to provide some information that I hope you will consider in imposing a sentence upon him.

I am the Director of Early Childhood Education at Congregation B'nai Israel in Boca Raton, Florida which currently enrolls approximately 400 students. I have been the director there for 22 years and was previously an early childhood director for ten years at other schools. I have served as Chairperson of the Council of Early Childhood Directors in Southern Palm Beach County, Vice President of the Jewish Council of Early Childhood Directors of Dade and Broward Counties, President of a Northern New Jersey Chapter of Women's American ORT, and have served on numerous other committees regarding education.

I have known Mathew Martoma for approximately four years. He and his wife enrolled their two younger children in Congregation B'nai Israel's early childhood program. They attended numerous events at Congregation B'nai Israel and were frequently on campus as parent from the school.

There were several things that have always impressed me about Mathew. The first is his ability to be non-discriminatory. From day one, he stated that he felt very comfortable at Congregation B'nai Israel. He never judged the Jewish religion even though his family is not Jewish. He attended numerous religious and non-religious events in support of where his children went to school. Many parents, who send their children to our school for "the education", do not support and/or attend school events.

The second thing that always impressed me about Mathew was his generosity. He and his family were extremely supportive of the school and the numerous charities that we support. Mathew and his family gave items for needy families and contributed to collections. At the end of one school year, Mathew and his family gave a generous gift to the school in appreciation for the education his children had received. This donation has helped to purchase much needed equipment for the children in our school.

It is important to note that at no time has he or did he ever ask for favors while

**Robert A. Silvers**  
Senior Rabbi

**Marci R. Bloch**  
Rabbi

**Andrew L. Rosenkranz**  
Rabbi/Development Director

**Stephanie Shore**  
Cantor

**Sharon Wagman**  
Executive Director

**Kim Beame**  
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**Linda Harris**  
Director of  
Early Childhood Education

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his children were in school. Many times parents who contribute either time or money feel that they have the right to receive favors from the school like asking for specific teachers or asking that their child be placed with certain friends. This is a man that did not expect anything back. He just showed appreciation.

In my history as a director, sorry to say, I have seen numerous parents convicted of crimes. Generally, these parents stop showing up at school. They drop out of sight and their children suffer for it. That has not been what Mathew has done. He has been selfless and courageous by showing up at school events even though he is aware that people are gossiping. He is much more concerned about being there for his children. I have seen his daughter playing the cello, in a school performance, and she consistently looks at her mom and dad and smiles. They have a well-developed parent/child bond! I know this because his children attend the same school as one of my grandchildren and I have seen him at many school events.

I am asking that you take Mathew's character as a non-judgmental, generous, selfless and courageous man into consideration when you are imposing sentence on Mr. Martoma. Thank you for taking the time to read this letter.

Sincerely,

A handwritten signature in cursive script that reads "Linda B. Harris". The signature is written in dark ink and is positioned above the printed name and title.

Linda B. Harris, M.S.

Early Childhood Director

# **EXHIBIT 32**

March 23, 2014

From

Nizy Idiculla  
George A Idiculla MD  
[REDACTED]  
Rockledge, FL 32955

To

Honorable Paul G Gardephe,  
United States District Court for the Southern District of New York  
United States Courthouse, 40 Foley Square  
New York, NY 10007

Dear Judge Gardephe,

I am Nizy Idiculla, Mathew Martoma's aunt on his mother's side. My husband, George Idiculla, is a physician practicing in Rockledge, Florida. I am currently working as the office manager of my husband's medical practice. Before coming to the US, I was teaching Botany in a college in India.

We are aware of the crime for which Mathew has been convicted and understand that he will be sentenced by your Honor. We are writing this letter on his behalf and hope you will consider it in imposing the sentence upon him.

We have known Mathew most of his life, starting from his childhood trips to India where we were living at that time. Mathew was a loving child. He always was curious and interested in new experiences. Though he did not speak our native language fluently, Mathew never stopped trying to connect with everyone while he visited his extended family. Our children and other family members have fond memories of him riding his bicycle around the outdoor well where we all gathered to brush our teeth every morning. It wasn't easy for him to use the outhouse, as was common at that time, but he never complained about the difficulties. Mathew took pride in making us laugh constantly and telling us how "cool" it was to him.

Many years later, on a family vacation to America, my son was diagnosed with childhood leukemia. Although my son has made a full recovery, our life was turned upside down at the time. Mathew's mother helped us with initial diagnosis, as well as with access to clinical studies at the National Institute of Health, which ultimately led to my son's full remission from cancer. During this time, Mathew's family home became our base of operations, and our children attended school locally with Martoma children. That period was chaotic, but I never forget that Mathew's family genuinely cared for us in our time of need.

These experiences have helped me sympathize with Mathew's current situation. One big difference: in my case I had the love and support of friends, family, community and even the American Medical establishment. Nobody wanted my son to suffer and everyone felt sorry for me. Mathew's situation seems different in this respect. The details of his criminal case make it difficult for friends,



family or his community know how to treat him. They are too scared, too embarrassed or too uninformed to know how to be compassionate.

After my son's remission, we immigrated to America and lived in Bethesda, Maryland. Mathew was in college at that time. He came to Washington DC for a summer job at the American Institute and stayed with us during that time. I remember that Mathew's internship was unpaid. He spent his own money to be there but was very excited to work at our nation's capital. During Dinner time conversations, Mathew passionately explained his projects to us and why he believed in America's unparalleled opportunities for immigrants.

Later, we moved our family to Rockledge, Florida where Mathew's mother ( my sister ) lives. Like every family, we saw positive and negative aspects of living so close to our extended family. One positive was getting to know Mathew as an adult. He seemed very driven with goals, but still had a huge heart. He married a wonderful woman, Rosemary, and was very loving of her. We attended their wedding and met their young family several times while they were visiting Rockledge. Mathew and Rosemary have genuine partnership that operates on shared responsibility. Though Rosemary was a licensed pediatrician, she stopped practicing eight years ago when their first child was born. They now have three small children who depend on them for everything. Though Rosemary stayed at home, that did not keep Mathew from being very involved in his kid's lives. We have seen firsthand how much Mathew cares for his children. They are very close to their dad. He plays with them, feeds them and reads bedtime stories to them. Watching their interaction, we feel he is a very good father to them and will be irreplaceable if they lose him.

From personal experience, I know how devastating it is to have one parent away when your children are young and there is tragedy around. My husband needed to be away at points during my son's treatment, and it was difficult for the rest of us. Mathew's children will miss their dad tremendously, and it can affect them emotionally. I fear that all these challenges will be too much for Mathew's wife and small children to bear.

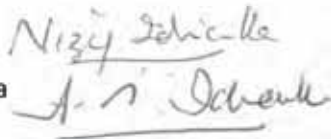
In closing, please consider this letter and exercise leniency in imposing Mathew's sentence.

Thank you, your Honor.

Sincerely,

Nizy Idiculla

George Idiculla

The block contains two handwritten signatures. The first signature, in cursive, reads "Nizy Idiculla". The second signature, also in cursive, reads "George Idiculla".

# **EXHIBIT 33**

Honourable Paul G. Gardephe  
United States District Court for the  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

[REDACTED]  
[REDACTED]  
Wellington 5011  
New Zealand  
Phone [REDACTED]

12 April 2014

**RE: A PLEA FOR MATHEW MARTOMA'S SENTENCING**

Dear Honourable Judge Gardephe,

My name is Jeco Jacob, and my wife is Beena. We have been living in New Zealand for the last 26 years. We work the IT industry and have two daughters. Dr. Rosemary Martoma is our cousin.

It has been a tough and sorrowful year for all of us hearing about the conviction of Rosemary's husband Mathew for stock trading, and it has caused extreme pain for the entire family. We have known Rosemary her whole life. She was the best student at school, and later attending the prestigious Auckland University School of Medicine. Though she qualified for more lucrative medical careers, we appreciated her desire to help children as a pediatrician. Our girls, Tania and Anita, consider Rosemary their role model, particularly Anita who is currently in medical school herself.

When Rosemary's family left New Zealand, it was a big loss for those of us left behind. We kept in constant contact with them and were so happy when she found her "Mr. Perfect" — Mathew Martoma, a young, well-educated boy with a loving soul like our Rosemary's. Our family came to attend their wedding in US in 2003, and our impression of Mathew has only gotten better since then.

In 2004, we were in India on an extended holiday when Mathew came to visit us there. We discovered that he is not the typical new generation type, out for himself. While his knowledge about the financial markets surprised me, I was most impressed by his passion. Mathew is a perfectionist at heart who wants to share his knowledge with others. That passion extends to topics other than finance.

Mathew spent a lot of time studying the poor in India. He was especially focused on orphanages and shared with us how he had worked with another facility in India to help



them get English books. Mathew and I visited a few orphanages in the area and learned that English books for children were not easy to find.

In 2012, we were lucky enough to have Mathew and Rosemary visit us again, this time in New Zealand. They stayed with us for four weeks. Over that time, I appreciated how Mathew had blossomed into a true family man. He was always with the children, sightseeing, playing cricket and netball with his kids in our driveway, or reading books to them about Maori legends. I envied the way he guided his family on everything from daily prayers to writing a travel journal.

Their family focus was also evident from the way they spent their time in New Zealand. Their travel was mainly a journey through the past to expose the children to the places Rosemary's parents had lived in and Rosemary and her only brother had grown up. Mathew's and Rosemary's simple lifestyle and their whole attitude to life made us to feel very comfortable during their stay. The five of them shared one bedroom and facilities; whenever they were around we shared family meals together; visited friends and families from the past. Five year old A■■ even got her ears pierced at the same pharmacy where Rosemary had hers done decades ago.

When someone stays with you for an extended period, you learn a lot about their character from the small things they do or don't do. Mathew was a wonderful house guest. We spent a lot of late nights talking about different subjects. Mathew still had a thorough knowledge about a wide variety of topics, but his passion was more seasoned. He hadn't lost his desire to help those less fortunate. He told us about a charity group he set up to fund good ideas, like the orphanages we visited years earlier in India. He was taking his time to look for something meaningful where he could get his kids involved in the process and teach them about giving back. We bounced many ideas off each other over those four weeks. Later, we became convinced of the Mathew's (and Rosemary's) genuineness in reaching out to the needy when we found out that they had put aside, while they themselves lived very prudently, a large proportion of their savings into a foundation, Mathew and Rosemary Martoma Foundation, for charitable work.

When we came to know about this case first it was a shock for all of us. I know Mathew is a very skilled person, and he could only have been doing his job well. He has skills and insight that a lot of others do not. It must be some misunderstanding or misinterpretation of his work that led to the guilty verdict. The news media in the US played up everything, and that could have caused a bias against Mathew. I cannot believe that a man of Mathew's values would engage in criminal conspiracy.

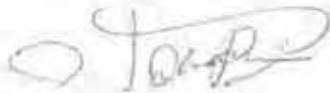
We are so sad that Rosemary's parents are going through toughest time of their life. They brought us to New Zealand and helped us start our life here. While they were here in New Zealand, they were leading a very peaceful life. They decided to move to America for their children's future, but never in our wildest dreams did we think that they would suffer as they are now. With only two children to support them and limited resources, her parent's future is now in jeopardy. The Indian custom is for children to care for their parents after a certain time. It is difficult to see now how this will happen.

Rosemary and Mathew were and still are positive role models for our two daughters. That is not surprising because, among their many qualities, Mathew and Rosemary are dedicated family people with a charitable and giving nature. Spending time with Mathew's children, I could see how much the children adored him and how in synchronisation the family was with each other's rhythm. In fact, I can't think of an example of Mathew doing something on his own when he visited us; everywhere he was, the family was too. If you remove Mathew from the equation, we worry that there will be many destabilizing effects with unintended consequences for Rosemary and the kids.

Mathew will always be in our prayers. We were shocked that the jury could not recognise the innocence of Mathew. Your Honour, as his family, we plead to you to please let Mathew go or reduce his sentencing as much as possible. A humble person like Mathew has already gone through enough in this trial and lost even more outside of it. Mathew has a lot to fulfill for the benefit of the society.

Please consider our sincere request and grant mercy to Mathew.

Thanking you faithfully,



Jeco & Beena Jacob



# **EXHIBIT 34**

Honourable Paul G. Gardephe  
United States District Court for the  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

[REDACTED]  
[REDACTED]  
Wellington 5011  
New Zealand  
Phone [REDACTED]

23 March 2014

**RE: A plea for Mathew Martoma's Sentencing**

Dear Your Honour Judge Gardephe,

I am Tania Jacob, writing this letter on behalf of my sister, Anita Jacob, and myself, and I request significant leniency from Your Honour with regards to the sentencing of my uncle, Mathew Martoma. We are both university students and are living in New Zealand with our parents. I am 22 years old and in my final semester of undergraduate studies in Software Engineering. Anita is 19 years old and is currently in her second year of Medical School. We were born and brought up in New Zealand.

Rosemary's family played a crucial role in helping my parents to come to New Zealand and get married here in New Zealand. My parents regularly tell us how Rosemary's family helped them sort out visas to live in New Zealand as far back as 1986 and even organised their wedding. Otherwise our life in New Zealand would not have been possible. Our parents always remind us of this example of unexpected kindness. It forever changed the course of our lives.

As children, we spent a lot of time with Rosemary and her family. It was very sad to see them leave New Zealand in 1999. A few years later, we made a special trip to the USA to attend Rosemary's marriage to Mathew. We remember feeling what a humble and caring guy Mathew was. My sister Anita was a junior bride for their wedding event; her dress was nearly as long as Rosemary's, and for an eight year old, this made Anita feel like a princess. After the marriage, we saw Rosemary and Mathew next in India. They came to visit my grandparents, and again I noticed how well liked Mathew was despite the language barrier. Mathew has a respect for elders and gets along with everybody.

In 2012, Mathew and Rosemary visited us for several weeks in New Zealand. We came to know their three kids - J [REDACTED], A [REDACTED] and D [REDACTED] - really well. Every day, we would go out to feed



the ducks near our house and get the kids feet dirty in the muck. It's refreshing to see American children who enjoy being outdoors.

We were very shocked to hear about Mathew's case in the news here in New Zealand. This was something we never expected, and it was distressing to see how overwhelmed Rosemary, her parents and the little children were about Mathew's arrest and conviction. At this stage, we would like Your Honour to please re-consider the guilty verdict against Mathew and release him from it. If it is not possible, please be soft on Mathew's sentence considering the complete dependence on him of his three innocent children and supporting wife. A tough sentence would affect the children horribly, will be devastating for our loving Rosemary, and very painful for our whole extended family.

Thanking you for considering my plea.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Tania Jacob', with a horizontal line underneath.

Tania Jacob

A handwritten signature in dark ink, appearing to read 'Anita Jacob', with a horizontal line underneath.

Anita Jacob



# **EXHIBIT 35**

Daisy John

[REDACTED]  
Lanham, MD 20706

March 28, 2014

Honorable Judge Paul G. Gardephe  
United States Court house,  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Dear Judge Gardephe,

My name is Daisy John. I am a 76 year old retired housewife. My nephew's name is Mathew Martoma. We call him "Ajai." I have known "Ajai", my younger brother Bobby's son for the last 34 years. I am writing this letter to Your Honor to request as much leniency for Ajai as you are willing to consider.

I had the good fortune to first meet Ajai in 1982 during my nephew, Suresh's wedding. When my grandchildren were young, my son would take his kids on family vacations to Florida every year. My son and grandchildren used to stay with Ajai and his parents at their home near Orlando. When my grandchildren came back from their vacation, they used to speak very highly of Ajai. He was always willing to spend quality time with them no matter how busy his schedule might seem. Ajai shared with them stories of his trip to the former Soviet Union, as a "goodwill" ambassador.

After graduating from Duke, Ajai went on to work at the National Institutes of Health in 1996. During his two years in Maryland, he would visit us regularly to provide general company and help us with various errands, gardening, etc. Ajai is a genuinely affable person. My late husband and Ajai would have hearty conversations on various topics including the advanced research that NIH was doing on diabetes, the condition that ultimately took his life.

After NIH, Ajai left for Boston, but kept in regular contact with the family. A few years later, Ajai came back to Maryland with his beautiful wife Rosemary and darling son J [REDACTED] to visit me and my brother who also lives in Maryland. We bonded over good south Indian cuisine and talked about how the world had changed. That said, I remember thinking at the time that Ajai had not changed very much with one exception – he had grown into a real family man. Seeing Ajai interact with his son told me a lot about his priorities.

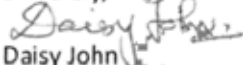
Since that time, I've watched Ajai become a very wonderful husband and loving father to his three young children. Being a grandmother with 6 grandchildren, I understand how important it is for children to grow up in a family environment with both parents. There are so many ways to mistreat a child and many of these problems may never surface until much later. In our culture, it is very difficult for single parents to thrive. Because divorce is not common, most social outings for young children are planned for two parent families. Organizers are reluctant to involve children from single parent families because of the awkwardness around parental interactions. It takes a lot of strength for single parents and their children to avoid feeling the burden of such negativity. I know firsthand because I've watched my own son raise his children as a single father. It was the hardest thing to endure after watching my late husband pass away.

Your Honor, Ajai is deserving of leniency for many reasons. This is Ajai's first offense, and he is not a threat to society. With his academic qualifications, skills and intelligence, Ajai can deliver more to the society as a part of it than locked away from it. Additionally, Ajai's children are in their formative years and need his guidance to develop. Ajai's wife would find it extremely difficult to find a career while taking care of their 3 children. Being young and under pressure from his parents to excel, Ajai made some disparate choices in his youth; however, I believe he deserves a chance to have a positive impact on society now.

I have faith that the right course of action will be considered by Your Honor and the justice system.

Thank you for considering this request for leniency.

Sincerely,

  
Daisy John

# **EXHIBIT 36**

Daniel P. John

Lanham, MD 20706

March 31, 2014

Honorable Paul G. Gardephe  
United States District Court for the  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**RE U.S. vs. Mathew Martoma, Request for Leniency in Sentencing**

Dear Honorable Judge Gardephe:

Thank you for the opportunity to submit this letter on behalf of my cousin, Mathew Martoma. I reside in the State of Maryland and have known Mathew all of his life. Over the years, I have had many opportunities to spend time with him. Mathew has so many positive attributes, and I would request that you consider using his potential and talents for the good of society as an alternative to other forms of sentencing.

I know Mathew pretty well. After earning his bachelor's degree from Duke University, Mathew moved to Maryland to work for the National Institutes of Health (NIH). During that time, he regularly visited my family, stayed with us overnight and joined into so many family events. We knew him to be a jovial, friendly, and warm personality. He was just as comfortable with my elderly parents as with my small children. We enjoyed his company very much. We saw Mathew as a rare gem and were so proud that he belonged to our family. Over the ensuing years and decades, our lives have all progressed in different directions, but we have remained a close family. When Mathew and Rosemary got married in July 2003, we were at the wedding. At our family marriages and events, they have always been present with the children. Mathew and Rosemary have traveled for family events in places as close as Maryland and as far away as India. Over the years, we have come to love him very affectionately.

From our past interactions with him, we know Mathew to be a very bright and talented individual. It has to be stated that just about everything Mathew earned in his life took a lot of effort. Every job that he took, every degree he earned, every school admission that he earned, every exam that he took - none of them were minor achievements. Whatever foolish mistakes he made at school should not diminish that fact. We still believe in him and the strong value system that he and the rest of our family represents. We as a family, stand by him fully. Mathew wants to be a positive contributor to society going forward, and we hope Your Honor's sentence will give him that chance.

Aside from academics, Mathew has always been family-oriented. By his actions and deeds, he shows constant affection and love for his wife and children. I know firsthand that he spends quality time with them, taking them to school, playing games with them in the evening, reading books at bedtime, etc. His children depend on him, and he is hardwired into their DNA. Mathew's children are still very young and need their father as a positive role model in their life. Even his New Zealand-born wife, Rosemary, is relatively new to America. She needs Mathew besides her to adjust to the deep losses to reputation, finances and self-determination she has and will face for standing by her husband.


Your Honor, please know that we are a very close-knit family who believe in contributing to society. I'm sure that's why, at such a young age, Mathew donated over a million dollars to charity to help schools, children's museums, science centers, universities, parks, civic groups, churches, patient advocacy groups, etc. I'm also certain that is why Mathew physically volunteered with dementia patients when was living here in Maryland. It's striking how little media attention these facts received around his trial, when every negative aspect unrelated to the charges were so well covered. Mathew learned from his past mistakes, but I worry that he is still being judged for them.

I last saw Mathew with the family at his trial in Manhattan, in February 2014. Based on what I saw and heard at the trial itself, the jury's verdict was shocking to me. I fear so many other factors were at play, and I worry most for his family. This case was the potential to reinforce the negative cycle of stereotypes for Mathew's wife and children that have followed Mathew throughout the case. We should not allow that to happen to guiltless children. Mathew is best situated to shield his children from these negative impacts, and I pray you will take their vulnerabilities into account in your sentence.

I believe Mathew has a lot to offer society and can be a productive citizen that contributes to his community. Our prayer to you is that he be given alternatives to prison, such as community service, or at least the minimum amount of jail time, as judicially feasible, so that his children are protected in their formative years and his wife is not abandoned.

I understand the seriousness of the matter before you and believe sincerely that Mathew understands this as well. I ask that the Court consider the Mathew we know. I ask for mercy and leniency in your sentencing. Mathew's family will do all that is possible to provide in the future a strong family support system.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel P. John", with a stylized, cursive script.


Daniel P. John



# **EXHIBIT 37**

Elizebeth John

April 14, 2014

  
Greewich  
London- SE10 9FQ, UK

Honourable Paul G. Gardephe  
United States District Court for the Southern District of New York  
United States Courthouse  
40 Foley Square New York, NY 10007

**RE: PETITION ON BEHALF OF MATHEW MARTOMA'S SENTENCING**

Your Honour Judge Gardephe,

I am the first cousin of Rosemary Martoma, the wife of Mathew Martoma. I work with Citibank based out of London, and my designation is Director, EMEA Cash Management Sales. I understand the seriousness of the charges of insider trading, for which Mathew was convicted. I am writing to offer my opinions about Mathew in the hopes that you will sentence him with the most leniency in your power.

As Rosemary is one of my few girl cousins and one of the nicest people I know, we have stayed in touch quite a bit over the years. We even got married in the same year (2003). I first met Mathew when he visited India and stayed over at our then home in Bangalore in 2004. Mathew was so tender and thoughtful towards my cousin Rosemary, that I felt an immediate kinship with him. Rosemary, who was expecting her first child at the time, became really sick with food poisoning, and it was amazing to watch Mathew take care of her. It is one of many times that I've known Mathew to put his personal interests ahead of others and do what is right.

While work has kept me busy, I have stayed in touch with Rosemary and Mathew over the years through our extensive family network and regular communications. Most recently, when my mother visited the US in 2012, Rosemary and Mathew invited her to stay with them in Florida. My mother came back from Florida full of praise for the way Mathew treated her during her visit. She was so very impressed by the tender care that Mathew showed his family. She specifically highlighted how Mathew, or as the children call him "Daddy" spent time with each child listening to their recounting of the day; helping them figure out what perplexed them; and kissing each good night before bedtime. My mother particularly appreciated how Mathew and Rosemary ensured the children were given a proper religious upbringing with prayers every night. There was a fairytale-like quality to her descriptions.

It was a shock for us to hear about Mathew's arrest and we have been following the trial throughout. When the jury reached its verdict, the first thing I thought of was how this verdict would shatter a loving family, deprive three innocent children of a father during their formative years and cause untold grief for Rosemary. In our family, there have been other tragic events. Long before Mathew, I remember hearing stories about my strong-willed attorney grandfather who fought for Indian independence, spent time in jail and almost died there. He fought for a noble cause by peacefully refusing to sign a pledge of allegiance to the British King.

By the time we heard these stories of his steadfast will and nerves of steel, our grandfather was celebrated as a hero by many fellow Indians. We grew up proud to be his family. It inspired us his grandchildren to dream the impossible and try to accomplish it. All his grandchildren, my cousins were inspired to pursue professions in medicine, law, finance, accounting, and information technology. But the generation prior,

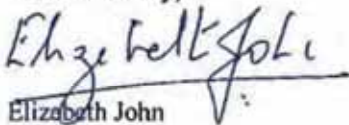
his own children, had to overcome great difficulties as a result of the suffering that our grandfather went through. In the end, some members of that generation faced long lasting and tragic consequences.

They were ravaged by the immediate aftermath of grandfather's years of sickness and debilitation following his release from jail. He had to be isolated for medical treatment for long periods of time. At that time, views of our grandfather were more mixed and often downright negative, because many still blindly believed in the inevitability of colonial rule. My grandfather, in hindsight, had done everything right, but it cost him dearly – his health, his dear wife's wellbeing, his children's upbringing, and his finances. Fortunately, by the time his children came of age, grandfather's reputation had been restored; his children found loving partners; and the next generation's stories had begun. This redemption was true for all but one of my parent's generation. I wonder often whether he would have made the same sacrifices that contributed to make India independent, had he anticipated the personal costs to those he loved.

Your Honour has the power to minimize tragedy. I would like to make a humble plea to Your Honour to have mercy on Mathew's family, especially his children, by reassessing all the evidence in a completely dispassionate conscience and see if you could come to free him of all charges. My heart flutters thinking of Mathew being punished, but if you must do so, please grant my humble entreaty that he be left with his family as he fulfils the terms of punishment [REDACTED]

Mathew is a good father and a valuable contributor to society. I'm sure you have heard all the good he has done to date, so I will spare rehashing them here, but my plea is for the people who need Mathew most, my cousin Rosemary, my nephews [REDACTED] and [REDACTED] and my niece A [REDACTED], and to the many needy in our society. They have no one else to protect them but Your Honour.

Yours sincerely,

  
Elizabeth John

# **EXHIBIT 38**



Mariakutty John  
[REDACTED]  
Bangalore, India

March 20, 2014

Honourable Paul G. Gardephe,  
United States District Court for the  
Southern District of New York  
New York, NY 10007

RE: LETTER OF SUPPORT FOR MATHEW MARTOMA

Your Honour Judge Gardephe,

I am Mariakutty John, aunt of Mathew Martoma. I reside in Bangalore, India with my son and his family. I had a bachelors degree (BSc) in chemistry, after which qualified as a lawyer with a LLB degree. However since we got married, due to family reasons, I chose to do a BEd degree in teaching. Subsequently, my husband and I taught for ten years in Africa and afterwards returned to India. I retired as a teacher from St Patrick's High School, Hyderabad, India, after devoting 30 years of my life to training young students there. Mathew's wife, Rosemary, is the only daughter of my older brother, David. Being a very tight knit family, we have been keenly following Mathew's case, praying and believing all along that he would be acquitted. However against all our hopes and beliefs, the honourable jury found him guilty. I am writing this letter with a heavy heart to share my thoughts about Mathew and to beg you to show him leniency during sentencing.

My late husband, Mr. K.P John, Chief Chemist at McDowell's Industries, was a tall, solidly built and soft spoken man, who embraced our children physically and emotionally with love and affection. He was a constant source of support to our children growing up. However, in his late 50's, my husband suffered a sudden, large and debilitating heart attack and subsequent stroke. It was a very difficult time for us as we watched Johnny slowly decline over the years and eventually pass away. My children were fortunate enough to experience the love of his father during early childhood, yet his separation was devastating.

Around this time, Mathew and Rosemary were married in Florida, and we were unable to attend the wedding because Johnny needed fulltime medical attention. Instead, the newlyweds travelled to India to visit us. Upon meeting Mathew it was obvious that he was the perfect match for Rosemary. As a family that had relished in every little milestone of Rosemary's, we all felt such a great sense of joy to see her so content in this new chapter of her life.

On a subsequent trip to America, my sister and I had planned to see all the sights in a short period of time. When Mathew and Rosemary found out that we were coming, they insisted that we go and stay with them. At the time, we were a bit reluctant, because as single grandmothers who spend plenty of time taking care of the little ones, we were most excited about sightseeing on that trip. But their consistent persuasion won us over. We are so happy that we went, it ended up being the highlight of our time in America. It was such a pleasure to spend time in the Martoma house. We had a chance to get to know a side of Mathew that most wouldn't see.

It became clear to my sister and I that Mathew's role as husband and father is his most cherished one. He dotes on his three beautiful children and wife. Mathew approaches fatherhood with passion, humility, patience and most of all dedication. He and Rosemary complement each other in every way. At home he is not afraid of "getting his hands dirty". Never afraid to "experiment" in the kitchen with the kids, to try braiding A [REDACTED] hair, or to delve into J [REDACTED] homework, Mathew is a fearless father. He is also the tireless father, who drives the children to school and extracurricular activities, cheers for his children during their practices and sporting events, watches A [REDACTED] twirl on stage, congratulates the kids on their successes, consoles them when they lose, and wipes away the tears. After school, Mathew always



makes it a point to talk with each child in detail about the highs and lows of their day. From their interaction, it is abundantly clear that they love this attention.

One memory I will share is going to church with the family on Sunday. As devout Catholics, we children were woken up very early in the mornings to attend church and we would often sit through the mass without any real understanding of the message behind the sermon. I was touched by the way Mathew had the children read from a children's Bible in the car and then led the discussion as the children tried to solve the message behind the story they had just read. At church, the priest greeted us and told us how much he values the Martoma family as parishioners. We also met one of Mathew's good friends whose wife was in the terminal stages of cancer. He shared with us how much strength Mathew was providing his family during this difficult time. Mathew is a man that is loved not only by his family, but also by his community. It would be a terrible loss to society to take such an intelligent, compassionate, and generous man away when he has the ability to give so much.

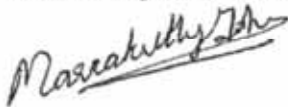
In my lifetime as a daughter, a mother and a school teacher, I have met all kinds of fathers. In my childhood, my father championed alongside Mahatma Gandhi for India's independence, and suffered incarceration during which time his health was badly damaged; consequently he had to be separated repeatedly from us for extended periods of Ayurvedic treatments. While our father's activism was a necessary and noble cause, it separated our beloved father from us at a time when our family needed him the most. Instead, during that time, we lived in anxiety and fear, and the sight of our mother's sorrow and suffering broke our hearts.

The devastation caused to our family due to that separation was irreparable. It is too painful to write about all the details of that time we passed through as a young family, but I will share with you perhaps the most terrible consequence. After our beloved father passed away at the age of 100, my darling youngest brother, who struggled from childhood to find his emotional balance, took his own life.

It is hard not to look back and wonder how his life may have been different if he had a stable childhood and if our father had been present during his tender formative years. It is a suffering that I pray that no mother or child should have to endure, let alone our precious Rosemary, J. A. and D.

I was shattered to hear that Mathew has been found guilty by an American court. I humbly appeal to Your Honour to exonerate him if at all possible or to punish him in such a way that his loving children do not miss their dad when they come back from school to share their day's events. From my experience, absence of a really involved father can in many ways hamper the development of children. If possible release him from blame. If you need to hand out punishment to him, please make it something that is home based, so that the children's confidence will not be broken and they will grow up under his protection and guidance.

Thanks and Prayers to Your Honour,

A handwritten signature in cursive script, appearing to read 'Mariakutty John', written in dark ink.

Mariakutty John

# **EXHIBIT 39**

Tina John

[REDACTED]  
Duluth, GA, 30096.

May 1, 2014

The Honorable Judge Paul G. Gardephe  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, NY 10007

Dear Judge Gardephe,

Subject: Mathew Martoma

I, Tina John, am writing this letter with regard to the case of Mathew Martoma, whose trial was held in your courtroom in the month of January 2014. Mathew's wife Rosemary is my sister in law. Even though I have known Mathew and Rosemary for the last three years, I got a chance to meet them and spent time with them only in the last one year. Both of them spared no effort to make me feel welcome into the family.

We were shocked when we learnt of the insider trader charges against Mathew and thought that the whole thing was a big misunderstanding which would eventually be sorted out. We have, of course, seen only the personal side of Mathew, and how well he treated Rosemary and the family. He is a wonderful husband to Rosemary and a great father to his three kids. Mathew and Rosemary helped me and my 6 month old son settle into this country when we moved here to join my husband. They made arrangements to ensure that we had all the necessary things for the baby, even before the baby and I moved to the US. It was touching to see how they were so thoughtful about the little things that made the baby's life so much easier.

In this short period that I have known Mathew, one of the things that impressed me most about him is the fact that he has been very calm and collected even in this difficult times that their family is going through. He has remained a pillar of support for his wife and kids, and was very mature and sensitive to the way he broke the news to their kids. J [REDACTED], A [REDACTED] and D [REDACTED] aged 8, 6 and 4 respectively are at an age where they need their Dad's presence in their everyday life. It would indeed be a shame if Mathew had to go away from his family for a long period.

Hedge funds, Wall Street and insider trading convictions have been in the news a lot recently. Lot of the news are true, though may be exaggerated. I would like to draw your attention to the fact that Mathew had given up the corporate life and moved to Florida to take care of his family, long before these charges have been leveled against him. Though this does not prove his innocence, it does prove that Mathew considered family to be more important to him than corporate ladders or money. He certainly did not want to be in high pressure money minded business.

Having known Mathew to be the family man he is, it is difficult to imagine him to be guilty of any charges that he was convicted of. I have full confidence in the legal system and we respect the verdict of the jury. However, I cannot help wondering if the jury was biased due to the amount of publicity the case had. I humbly request you to consider the possibility of a bias and determine if Mathew is deserving of a fresh trial. In case you decide that the verdict was fair, I would urge to you to consider the impact of Mathew's conviction on his young family and show leniency at his sentencing so that his wife and children do not have to miss his presence in their life.

Regards,

Tina John

